

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GILBERT JAMES,

Plaintiff,

v.

Civil Action No. 3:11cv00221

ENCORE CAPITAL GROUP, INC., *et al.*

Defendants.

**RESPONSE TO PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO SERVE
EXPERT WITNESS DISCLOSURES**

Defendants, Encore Capital Group, Inc., Midland Funding, LLC, and Midland Credit Management, Inc. (collectively, “the Midland Defendants”), by counsel, hereby submit this response to Plaintiff’s Motion for Extension of Time to Serve Expert Witness Disclosures.

Under the terms of the Pretrial Scheduling Order entered in this action (Dkt. No. 16), Plaintiff’s expert witness disclosures were due on October 17, 2011. That same day, Plaintiff filed his motion seeking a two-week extension of time to serve his expert witness disclosures. The Midland Defendants express no opposition to such an extension provided that the deadline for Defendants’ expert witness disclosures is likewise extended for a period of two weeks from November 16, 2011 until November 30, 2011. The Midland Defendants are willing to enter into an Agreed Order reflecting this mutual enlargement.

**ENCORE CAPITAL GROUP, INC.,
MIDLAND FUNDING, LLC and
MIDLAND CREDIT MANAGEMENT, INC.**

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of October, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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